

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

STRIKE 3 HOLDINGS, LLC, )  
v. )  
GEORGE BORDLEY, )  
Plaintiff, ) Civil Case No. 2:18-cv-00868-JHS  
Defendant. )  
)

## **PLAINTIFF'S MOTION TO COMPEL**

Pursuant to Fed. R. Civ. P. 37(a)(1), and upon the attached Memorandum of Law in support of this motion and all exhibits attached thereto, Strike 3 Holdings, LLC (“Plaintiff”), respectfully moves for entry of an order compelling Defendant, George Bordley (“Defendant”) to provide complete responses to Plaintiff’s Request for Production Nos. 1, 13, 15, 16 and Interrogatory No. 11 (the “Motion”). A proposed order is attached for the Court’s convenience.

Dated: January 31, 2019

Respectfully submitted,

FOX ROTHSCHILD, LLP

By: /s/ Andrew W. Bonekemper  
Christian Moffitt, Esq. (206770)  
cmoffitt@foxrothschild.com  
Andrew W. Bonekemper, Esq. (84313)  
abonekemper@foxrothschild.com  
10 Sentry Parkway, Suite 200  
P.O. Box 3001  
Blue Bell, PA 19422-3001  
Tel.: (610) 397-6500  
Fax: (610) 397-0450  
[www.foxrothschild.com](http://www.foxrothschild.com)  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2019, a true and correct copy of the foregoing document was served via the CM/ECF system to the following:

Joseph A. Bahgat, Esq.  
Privacy Law Firm  
1701 Walnut St. #70354  
P.O. Box 37635  
Philadelphia PA 19101-0635  
Email: joe@privacyfirm.law

*Attorney for Defendant*

**FOX ROTHSCHILD, LLP**

By: /s/ Andrew W. Bonekemper  
Christian Moffitt, Esq. (206770)  
cmoffitt@foxrothschild.com  
Andrew W. Bonekemper, Esq. (84313)  
abonekemper@foxrothschild.com  
10 Sentry Parkway, Suite 200  
P.O. Box 3001  
Blue Bell, PA 19422-3001  
Tel.: (610) 397-6500  
Fax: (610) 397-0450  
[www.foxrothschild.com](http://www.foxrothschild.com)  
*Attorneys for Plaintiff*